

South Slope Cooperative Telephone Company
d/b/a South Slope Wireless
980 North Front, PO Box 19
North Liberty, IA 52317

May 15, 2006

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 – 12th Street, S.W.
Washington, D.C. 20554

Re: WT Docket No. 01-309
HAC Digital Wireless Telephones

Semi-Annual Report

Dear Ms. Dortch:

South Slope Cooperative Telephone Company - d/b/a South Slope Wireless ("South Slope") is the licensee of Broadband PCS Stations WPOL801 (A-Block, Partitioned Submarket 82, – Des Moines-Quad Cities MTA), WPOL802 (A-Block, Partitioned Submarket 86, – Des Moines-Quad Cities MTA), WPSF627 (A-Block, Partitioned Submarket 222, – Des Moines-Quad Cities MTA), WPWM732 (A-Block, Partitioned Submarket 262, – Des Moines-Quad Cities MTA) and WPZU774 (A-Block, Partitioned Submarket 270, – Des Moines-Quad Cities MTA). This report is submitted pursuant to the requirements of Paragraph Nos. 89 – 91 of the Commission's *Report and Order* (WT Docket No. 01-309), FCC 03-168, released August 14, 2003 ("R&O").

By way of background, South Slope is a small, Tier III Commercial Mobile Radio Service licensee, as defined in the Commission's E-911 *Order to Stay*, FCC 02-210, released July 26, 2002. South Slope's wireless system employs a GSM air interface and is configured to operate as part of the *i wireless* network. *i wireless* is headquartered in Urbandale, Iowa, and is a partnership between T-Mobile USA and Iowa Network Services ("INS"). South Slope currently markets a variety of Motorola and Nokia digital wireless handset models, among others. To the best of South Slope's knowledge (after diligent research by its counsel and by staff and representatives of *i wireless*) there are no GSM handsets commercially available to South Slope or to *i wireless* that meet a U3 rating for radio frequency interference under ANSI Standard C63.19. However, South Slope has learned that there are at least seven (7) models of GSM handsets commercially available that have achieved an M3 rating or better under ANSI Standard C63.19. These include the LG L1400/1400i, the LG C2000, the Motorola V220, the Motorola V3, the Nokia 6102h, the Samsung P207 and the Samsung D307 (which has achieved an M4 rating). Of the thirteen (13) handset models that South Slope is currently selling, two (2) of these handsets have achieved an M3 rating, the Motorola V220 and the Motorola V3.

As a small, Tier III wireless carrier, South Slope has no influence over the product development and distribution decisions of wireless handset manufacturers; and it must rely on the manufacturers to develop HAC-compliant digital wireless handsets for its system. Given the foregoing, the information requested by the Commission is identified as follows:

Item 1 -- Digital Wireless Phones Tested: None. As described above, South Slope is a small carrier that is not involved in the handset development or testing process. The Company will rely on testing performed by the handset manufacturers.

Item 2 -- Laboratory Used: None. See Response to Item 1

Item 3 -- Test Results For Each Phone Tested: Not applicable. See Response to Item

Item 4 -- Identification Of Compliant Phone Models and Ratings According To ANSI C63.19: South Slope has been unable to identify any commercially available GSM handsets that meet a U3 rating under ANSI Standard C63.19. However, South Slope has learned that there are at least seven (7) models of GSM handsets commercially available that have achieved an M3 rating or better under ANSI Standard C63.19.

Item 5 -- Report On The Status Of Product Labeling: None. It is anticipated that product labeling will be handled by the handset manufacturers. In this regard, South Slope understands that **Motorola** and **Nokia** have been active on the ATIS Incubator for Hearing Aid Compatibility. Both companies participate in ATIS Working Group 6, which is addressing labeling and educational insert language issues. Working Group 6 is comprised of wireless manufacturers, carriers, and hearing-impaired user representatives, and is focused on creating a standard format for HAC labeling per FCC regulations that will educate consumers and allow hearing-impaired advocates to assist in consumer education.

In addition, we are aware that some confusion may arise regarding the handset labeling standards contained in the 2001 and draft 2005 version of the C63.19 standard, which specify different letter designations for HAC compliance. However, we are aware that some confusion may arise regarding the handset labeling standards contained in the 2001 and draft 2005 version of the C63.19 standard, which specify different letter designations for HAC compliance. While the 2001 version of the C63.19 standard uses a “U” rating for radiofrequency (RF) immunity and a “UT” rating for acoustic coupling, the 2005 version uses labeling that is consistent with the switches on hearing aids (*i.e.*, specifying “M” for Microphone and “T” for T-Coil). Accordingly, all compliant handsets offered by the Filer will be labeled with the “M” and “T” ratings associated with the 2005 draft version of the ANSI technical standard, as appropriate.¹

¹ See In the Matter of Section 68.4(a) of the Commission’s Rules Governing Hearing Aid-Compatible Telephones, *Order on Reconsideration and Further Notice of Proposed Rule Making*, 36 CR 190, 20 FCC Rcd 11221 at ¶¶ 33-36 (2005).

Item 6 -- Report On Outreach Efforts: South Slope has developed a hearing aid compatibility information sheet to assist hearing impaired customers in selecting current model phones and accessories most suitable to their needs. This information sheet will also serve to educate the company's employees and retail sales force about HAC-related issues and possible solutions. South Slope also understands that **Motorola** and **Nokia** have been involved in various outreach activities and each have developed web sites devoted to providing additional information about HAC. Links to these sites are provided below:

<http://www.motorola.com/consumer/accessibility>.

<http://www.nokiaaccessibility.com/>

Item 7 -- Information Related To Retail Availability of Compliant Phones: Upon information and belief, there are currently no GSM handsets commercially available that meet a U3 rating under ANSI Standard C63.19. Once such handsets become commercially available, South Slope will work with *i wireless* and T-Mobile to obtain an appropriate selection of handset models and to market them to current and potential subscribers. In the meantime, South Slope currently has two (2) models of GSM handsets in stock and commercially available that have achieved an M3 rating or better. Moreover, all of the handsets that *i wireless* carries have available accessories (adapters and neck loops) that allow the handsets to be used with TTY/TDD devices and hearing aids.

Item 8 -- Information Related To Incorporating Hearing Aid Compatibility Features Into Newer Models Of Digital Wireless Phones: The incorporation of HAC features into newer models of digital wireless telephones will be accomplished by the handset manufacturers.

Item 9 -- Any Activities Related To ANSI 63.19 Or Other Standards Work Intended To Promote Compliance With The Requirements Of The Commission's Report and Order: None. The Filer is a small carrier that is not involved in standards development.

Item 10 -- Total Numbers Of Compliant And Non-Compliant Phone Models Offered As Of The Date Of This Report: As noted above, South Slope currently offers a total of thirteen (13) GSM handsets. Upon information and belief, none of these handsets meet a U3 rating under ANSI Standard C63.19, but two (2), the Motorola V220 and the Motorola V3, have achieved an M3 rating or better. In addition, all of the handsets offered by South Slope have available accessories (adapters and neck loops) that allow the handsets to be used with TTY/TDD devices and hearing aids.

Item 11 -- Any Ongoing Efforts For Interoperability Testing With Hearing Aid Devices: None. South Slope is a small carrier that is not involved in handset interoperability testing with hearing aid devices.

Should you have any questions concerning this report, please contact John Prendergast or Cary Mitchell of the law firm of Blooston, Mordkofsky, Dickens, Duffy & Prendergast. Either may be reached by calling (202) 659-0830.

Respectfully submitted,

**SOUTH SLOPE COOPERATIVE TELEPHONE
COMPANY D/B/A SOUTH SLOPE WIRELESS**

A handwritten signature in cursive script that reads "J. R. Brumley, CEO". The signature is written in dark ink and is positioned above the printed name.

J. R. Brumley, CEO